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April 1, 2016

VIA ECF

Hon. Steven I. Locke
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Siancas v. Rallye Motors, et al.*, 14-cv-6151 (JS) (SIL)
Status Report

Dear Judge Locke:

I represent the Plaintiffs in the above referenced FLSA matter. I submit this a status report pursuant to the Court's Docket Order of February 22, 2016.

On December 15, 2015 counsel for Exclusive Detailing, Inc., after more than a year of vigorously defending this FLSA case, indicated that he was amenable to participating in a settlement conference. All parties requested a settlement conference on December 17, 2015. (ECF No. 112).

On January 11, 2016, the Court issued a docket order scheduling a settlement conference for Tuesday, February 23, 2016 at 2:00 PM.

The day before the settlement conference, Mr. Chong requested to be excused from the settlement conference on the basis that his client would be seeking bankruptcy protection. (ECF No. 118).

In light of Mr. Chong's representation, the Court issued a docket order adjourning the settlement conference without a date.

On February 25, 2016 Mr. Chong informed me via email that a Bankruptcy Petition had been filed under Case No. 16-13291 in New Jersey. However, research reveals that the petition filed does not pertain to any party to this case. Case No. 16-13291 is the bankruptcy petition of two non-parties – Michael Agolia and Lisa Agolia. They are the principals of Exclusive Detailing, Inc. The first page of the petition is annexed hereto as Exhibit 1.

Exclusive Detailing, Inc. has not filed for bankruptcy. *See* Exhibit 2.

Plaintiff respectfully requests that a status conference be held and that Counsel for Exclusive Detailing, Inc. be directed to attend. Counsel for the Rallye Defendants joins in this request.

Respectfully submitted,

I



Steven John Moser

Attachment: Exhibit 1: Voluntary Petition
Exhibit 2: Search of the Bankruptcy Court website for Exclusive Detailing